

January 28, 2013

Mr. Vojin Janjic
Manager Permit Section
Division of Water Resources
Tennessee Department of Environment and Conservation
L&C Annex, 6th Floor
401 Church Street
Nashville, Tennessee 37243-1534

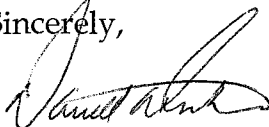
**Subject: National Pollutant Discharge Elimination Systems (NPDES)
Permit Renewal Application for Rockwood Lithium, Inc.
New Johnsonville, Tennessee Plant
Response to Notice of Incomplete Application
Permit # TN0062537**

Dear Mr. Janjic:

This letter is in response to your Notice of Incomplete Application, which was mailed on January 8, 2013. This notice stated that as part of a complete application that Rockwood Lithium is required to perform an alternatives analysis. This notice also requested that Rockwood Lithium measure the temperature of the Outfall 001 wastewater. This submittal is intended to fulfill this requirement of an alternatives analysis.

If you have any questions about this correspondence, please do not hesitate to call me at 931-535-6201 or email me at Darrell.Fisher@rockwoodlithium.com.

Sincerely,



Darrell Fisher
Rockwood Lithium, Inc.
Director of Operations - Butyllithium & Specialty Products

RECEIVED

JAN 31 2013

TN Division Of Water
Pollution Control

Alternatives Analysis

RE: Rockwood Lithium NPDES Permit No. TN0062537

Alternative #1: Connection to a Publically Owned Treatment Works

The nearest sanitary sewer line, maintained by the City of New Johnsonville, is approximately a quarter mile from the Rockwood property. In addition, the current discharge contains storm water, which is not permitted to be discharged into the sanitary sewer system. This alternative is deemed to be not feasible.

Alternative #2: Onsite Land Application

Rockwood does not own sufficient undeveloped land for the land application of the effluent. As noted in Alternative #1, the effluent also contains storm water in addition to process wastewater. This alternative is deemed to be not feasible.

Alternative #3: Water Re-Use / Recycling

The operations at Rockwood consume relatively low amounts of water. Re-use of the process wastewater alone would require extensive, costly treatment. In addition, there would be no possibility of onsite reuse of the storm water collected in the discharge pond. This alternative is deemed to be not feasible.

Site personnel measured the temperature of the discharge from Outfall 001 on January 10, 2013. The temperature of the discharge from Outfall 001 was 49 degrees Fahrenheit.

RECEIVED

JAN 31 2013

TN Division Of Water
Pollution Control